

June 22, 2015

7852 Walker Drive, Suite 200 Greenbelt, Maryland 20770 phone: 301-459-7590, fax: 301-577-5575 internet: www.jsitel.com, e-mail: jsi@jsitel.com

Accepted / Filed

JUN 22 2015

Federal Communications Commission
Office of the Secretary

Via Hand Delivery

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

Re:

WC Docket No. 14-58

2015 ETC Annual Report of Saco River Telephone LLC d/b/a OTT

Communications

Study Area Code 100022

Dear Ms. Dortch:

On behalf of Saco River Telephone LLC d/b/a OTT Communications ("Company"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules. Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information. The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of its Progress Report on its Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall JSI Vice President

301-459-7590

jkuykendall@jsitel.com

No. of Copies rec'd_

List ABCDE

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

3 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).

Echelon Building II, Suite 200 9430 Research Blvd., Austin, TX 78759 phone: 512-338-0473, fax: 512-346-0822 Eagandale Corporate Center, Suite 310 1380 Corporate Center Curve, Eagan, MN 55121 phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road Bldg. B-3, Suite 200, Atlanta, GA 30328 phone: 770-569-2105, fax: 770-410-1608 547 South Oakview Lane Bountiful, UT 84010 phone: 801-294-4576, fax: 801-294-5124

¹ 47 C.F.R. §§ 54.313, 54.422.

² Connect America Fund et al., WC Docket No. 10-90 et al., Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).



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Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

Federal Communications Commission Office of the Secretary

Re:

WC Docket No. 14-58

2015 ETC Annual Report of Saco River Telephone LLC d/b/a OTT

Communications

Study Area Code 100022 Request for Confidentiality

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client Saco River Telephone LLC d/b/a OTT Communications (the "Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules, withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

- 1. The information for which the Company is seeking confidential treatment is an attachment to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").³
- Pursuant to Section 54.313(a)(1), Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission a Progress Report on its Five-Year Service Quality Improvement Plan ("Progress Report") which is contained in the attachment to the 2015 Report.⁴
- 3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Progress Report provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

^{3 47} C.F.R. §§ 54.313, 54.422.

^{4 47} C.F.R. §§ 54.313(a)(1).

With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its March 5, 2013 Order, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."5 The Company's Progress Report updates this information as well as provides maps and detailed information as to whether or not network improvement objectives were achieved at the wire center level. Accordingly, because the Company is a rate-of-return carrier, it must file Progress Reports which contain proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

- 5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
- With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing

⁵ See Connect America Fund et al., WC Docket 10-90 et al., Order, DA 13-332 (rel. Mar. 5, 2013) ("March 5, 2013 Order") at para 9 citing Section 54.202(a) (1) (ii).

Request for Confidentiality Page 3

the attachment under seal. The Company uses the information contained in the Progress Report to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

- 7. Any previous versions of this information are not publicly available.
- Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
- Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Progress Report provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,

John Kuykendall JSI Vice President

301-459-7590

jkuykendall@jsitel.com

FCC For	m 481 - Carrier Annual Reporting REDAC	TED FOR PUBLIC	MAPPECTION PROFESSION	10-4 Columns (consellar) and ass
<010>	Study Area Code	100022		A THE CHARLES OF THE CONTROL OF THE
<015>	Study Area Name	SACO RIVER TEL & TE	T.	Accepted / Filed
<020>	Program Year	2016		
<030>	Contact Name: Person USAC should contact with questions about this data	Megan Cobleigh		JUN 22 2015
<035>	Contact Telephone Number: Number of the person identified in data line <030>	2079929050 ext.		Federal Communications Commiss Office of the Secretary
<039>	Contact Email Address: Email of the person identified in data line <030>	megan.cobleigh@ottc	communications.com	
ÁNNU	NI, REPORTING ECHNALE CARRIERS			Completed Completed (check box when complete)
<100>	Service Quality Improvement Reporting	/2	(complete attached worksheet)	1 1856 18 18 18
<200> <210>	Outage Reporting (voice)	o outages to report	(complete attached worksheet)	V 4131110
<300>	Unfulfilled Service Requests (voice) 0			b. 84 84 85 85 8
<310>	Detail on Attempts (voice)		(attach descript	ive document)
<320>	Unfulfilled Service Requests (broadband)			
<330>	Detail on Attempts (broadband)		(attach descrip	ntive document)
<400>	Number of Complaints per 1,000 customers (voice)			
<410>	Fixed 0.28			/ /
<420> <430>	Mobile 0.0 Number of Complaints per 1,000 customers (broad	band)		- bassass
<440>	Fixed 0.0			
<450> <500>	Mobile 0.0 Service Quality Standards & Consumer Protection 6	Rules Compliance	(check to indicate certification)	/ /
<510>	100022me510.pdf		(attached descriptive document)	
<600>	and the second s		(check to indicate certification)	1 1
	100022me610.pdf			
<610>			(attached descriptive document)	
<700>	Company Price Offerings (voice)		(complete attached worksheet)	1 111111
<710>	Company Price Offerings (broadband)		(complete attached worksheet)	
<800>			(complete attached worksheet)	
	Tribal Land Offerings (Y/N)? Voice Services Rate Comparability Certification	-	yes, complete attached worksheet) es	<u> </u>
<1010	•		(ottach descriptive document)	
<1100	> Certify whether terrestrial backhaul options exist	Yes or No) O	(if not, check to indicate certification)	William.
<1110: <1200:	> Terms and Condition for Lifeline Customers		(complete attached worksheet) (complete attached worksheet)	THE STATE
	Price Cap Carriers, Proceed to Price Cap Additional	Documentation Works		
<u>0</u> 22355	Including Rate-of-Return Carriers affiliated with P	rice Cap Local Exchange		
<2000> <2005>			(check to indicate certification) (complete attached worksheet)	
	Rate of Return Carriers, Proceed to ROR Additional	l Documentation Work		
<3000>			(check to indicate certification)	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1

1975	ervice Quality Improvement Reporting		Mark Comments	FCC Form 481 OMB Control No. 3 July 2013	060-0986/OMB Control No.	3060-0819
<010>	Study Area Code	100022			into-	
<015>	Study Area Name	SACO RIVER TEL &	TEL			
<020>	Program Year	2016				FAR ALLESSANS
<030>	Contact Name - Person USAC should contact regarding this data	Megan Cobleigh				
<035>	Contact Telephone Number - Number of person identified in data line <030>	2079929050 ext.				Fill (MICHELL)
<039>	Contact Email Address - Email Address of person identified in data line <030>	megan.cobleigh@o	tcommunications.com			
<110>	Has your company received its ETC certification from the FCC?	(yes / no	0 0			
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no	,00			
<112>	If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service. Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your of CETC which only receives frozen support, your progress report is only	1 00000	022me112.pdf	1-00-	VS	
	required to address voice telephony service.		(2			
	Please select the appropriate responses below (Yes, No, Not Applicable) to confit that the attached document(s), on line 112, contains a progress report on its five service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.	e-year		Name of Attached Docu	iment	
	Maps detailing progress towards meeting plan targets		Yes]		
<113>			Yes	7		
	Report how much universal service (USF) support was received					
114>	Report how much universal service (USF) support was received How much (USF) was used to improve service quality and how support was used to impro	ove service quality	Yes	1		
<114> <115>			Yes	7		
<113> <114> <115> <116> <117>	How much (USF) was used to improve service quality and how support was used to improve	prove service coverage	Name and Address of the Owner o	3		

(200) Service Outage Reporting (Voice)	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	100022
<015>	Study Area Name	SACO RIVER TEL & TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Megan Cobleigh
<035>	Contact Telephone Number - Number of person identified in data line <030>	2079929050 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	megan.cobleigh@ottcommunications.com

a>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<c1></c1>	<c2></c2>	<d>></d>	<e></e>	<f>></f>	<g>></g>	<h>></h>
PRS rence ber	Outage Start Date	Outage Start Time	Outage End Date	Outage End Time	Number of Customers Affected	Total Number of Customers	911 Facilities Affected (Yes / No)	Service Outage Description (Check all that apply)	Did This Outage Affect Multiple Study Areas (Yes / No)	Service Outage Resolution	Preventati Procedure
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	RS rence	RS Outage Start	RS Outage Start Outage Start	RS Outage Start Outage Start Outage End	RS rence Outage Start Outage Start Outage End Outage End	RS Outage Start Outage Start Outage End Outage End Number of	RS Tence Outage Start Outage End Outage End Outage End Number of Customers Affected Total Number of	RS Tence Outage Start Outage Start Outage End Outage End Outage End Time Date Time Outage End Customers Affected Total Number of Affected	RS Tence Outage Start Outage Start Outage End Outage End Outage End Customers Affected Total Number of Affected Description (Check	RS Tence Outage Start Outage End Outage End Outage End Number of Date Time Date Time Customers Affected Total Number of Affected Description (Check Study Areas	RS Tence Outage Start Outage End Outage End Outage End Number of Date Time Date Time Customers Affected Total Number of Affected Description (Check Study Areas Service Outage

AT STATE OF THE STATE OF	ce Offerings including Voice Nate Office lection Form	FCC Form 481 Olds Control No. 3069-0366/Olds Control No. 3069-0819 July 2013
<010>	Study Area Code	100022
<015>	Study Area Name	SACO RIVER TEL & TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Megan Cobleigh
<035>	Contact Telephone Number - Number of person identified in data line <030>	2079929050 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	megan.cobleigh@ottcommunications.com
<701> <702>	Residential Local Service Charge Effective Date 1/1/2015 Single State-wide Residential Local Service Charge	

<703>

<81>	<825	<93>	40		2635	<045	485>	<0>
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fed
				See at	tached worksheet			
			Ĭ					
							- 0)	

172P-552300000	ection form	FCC Form 481 Office Control No. 3000-0806/Chill Control No. 3060-0819 66-7013
<010>	Study Area Code	100022
<015>	Study Area Name	SACO RIVER TEL & TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Megan Cobleigh
<035>	Contact Telephone Number - Number of person identified in data line <030>	2079929050 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	megan.cobleigh@ottcommunications.com

1>	ab	•	els .	ob.	3	201×	eb .	cdSs	<66 >
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rate and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Affowance (GB)	Usage Allowance Action Taken When Limit Reached (selec
E									
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F									
				See attac	ned				
				worksheet -					
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T. P. P. S.	ection Form		OMB Control No. 3080-0986/OMS Control No. 3060-08 July 3013
			Sur Cotts
<010>	Study Area Code		100022
<015>	Study Area Name		SACO RIVER TEL & TEL
<020>	Program Year		2016
<030>	Contact Name - Person USAC should contact regarding this data		Megan Cobleigh
<035>	Contact Telephone Nun	nber - Number of person identified in data line <030>	2079929050 ext.
<039>	Contact Email Address -	Email Address of person identified in data line <030>	megan.cobleigh@ottcommunications.com
<810>	Reporting Carrier	Saco River Telephone LLC	
<811>	Holding Company	Otelco Inc.	
<812>	Operating Company	Saco River Telephone LLC	

(g)	4525	dÞ
Affiliates	SAC	Doing Business As Company or Brand Designation
See	attached worksheet	
		11034831 2400 CC 1111
	· · · · · · · · · · · · · · · · · · ·	

SERVICE SECTION FOR THE SERVICE	oal Lands Reporting ection Form	PCCForm #81 GNIS Control No. 3060-0819 July 2019
<010> <015> <020> <030> <035> <039> <910>	Study Area Code Study Area Name Program Year Contact Name - Person USAC should contact regarding this data Contact Telephone Number - Number of person identified in data line <0 Contact Email Address - Email Address of person identified in data line <1 Tribal Land(s) on which ETC Serves	
<920>	Tribal Government Engagement Obligation	Name of Attached Document
to confidemons § 54.313 <921>	ompany serves Tribal lands, please select (Yes,No, NA) for each these boxes on the status described on the attached document(s), on line 920, trates coordination with the Tribal government pursuant to 8(a)(9) includes: Needs assessment and deployment planning with a focus on Tribal community anchor institutions.	Select Yes or No or Not Applicable
<922> <923> <924> <925> <926> <927> <928> <928>	Feasibility and sustainability planning; Marketing services in a culturally sensitive manner; Compliance with Rights of way processes Compliance with Land Use permitting requirements Compliance with Facilities Siting rules Compliance with Environmental Review processes Compliance with Cultural Preservation review processes Compliance with Tribal Business and Licensing requirements.	

276.2762.000	o Terrestrial Backhaul Reporting Hection Form	FCC Form 482 OMB Control No.: 3060-0986/OMB Control No.: 3060-0819 Mily 2013
<010>	Study Area Code	100022
<015>	Study Area Name	SACO RIVER TEL & TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Megan Cobleigh
<035>	Contact Telephone Number - Number of person identified in data line <030>	2079929050 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	megan.cobleigh@ottcommunications.com
<1120>	Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).	
<1130>	Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 k upstream within the supported area pursuant to § 54.313(g).	bps

Lifeline	ection Form	FCC Form 481 OMB Control No. 3060-0586/OMB Control No. 3060-0819 July 2953
<010>	Study Area Code	100022
<015>	Study Area Name	SACO RIVER TEL & TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Megan Cobleigh
<035>	Contact Telephone Number - Number of person identified in data line <030	> 2079929050 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030	> megan.cobleigh@ottcommunications.com
<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	100022me1210.pdf
<1220>	Link to Public Website HTTP	Name of Attached Document
"Diagra ci	heck these boxes below to confirm that the attached document(s), on line 1210,	
	bsite listed, on line 1220, contains the required information pursuant to	
	(a)(2) annual reporting for ETCs receiving low-income support, carriers must	
<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	
<1222>	Details on the number of minutes provided as part of the plan,	
<1223>	Additional charges for toll calls, and rates for each such plan.	

(2000) Pr	ice Cap Carrier Additional Documentation	And the second of the second o
Date Cell	ection Form	ONIS Cottered No. 3060-0986/OMS Centrel No. 3060-0819
including	Rate-of-Return Corners affiliated with Price Cop Local Exchange Corners	NAY NO.
<010>	Study Area Code	
<015>	Study Area Name	100022
<020>	Program Year	SACO RIVER TEL & TEL
<030>	Contact Name - Person USAC should contact regarding this data	2016
<035>	Contact Telephone Number - Number of person identified in data line <030>	Megan Copleign
<039>	Contact Email Address - Email Address of person identified in data line <030>	2079929050 ext.
		megan.coblelgnwottcommunications.com
Select th	e appropriate responses below (Yes, No, Not Applicable) to note compliance as	a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, a
	게 있다면서 보면 보다 그렇게 가는 그렇게 보다는 그렇게 그 그래요? 그렇게 되었다면서 그렇게 하셨다면서 사용하게 하는 것이다면서 하다 되었다면서 그렇게	mation reported on this form and in the documents attached below is accurate.
	Incremental Connect America Phase I reporting	
<2010>	2nd Year Certification (47 CFR § 54.313(b)(1)i)	
<2011a>	3rd Year Certification (47 CFR § 54.313(b)(1)ii)	
<2011b>	Attachment (47 CFR § 54.313(b)(1)ii)	
	The transport of the standard of the second product of the standard of the sta	1
		Name of Attached Document(s) Listing Required Information
	Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))	
<2012>	· '얼마 전기가 가게 하다 이 경기' · '이 아이를 보고 있는데 가지 않는데 하지 하지 않는데 하지 하지 않는데 하지 하지 않는데 하지 하지 않는데 하지 하지 않는데 하지 하	
<2013>	[- [- [- [- [- [- [- [- [- [-	
<2014>	는 사용 마셨는데지를 가지 않는데 하면 하면 가게 되었다면 열어 가입하다면 되었다면 되었다면 되었다면 이 경험에 되었다면 이 유리를 통해 보다.	
<2015>		
	Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))	
<2016>		
<2010>		
<2017>	Connect America Phase II Reporting (47 CFR § 54.313(e))	
<2017>	Sid year broadband Service Certification	
<2019>	Str year broadband Service Certification	
<2020>		
<2020>	Please check the box to confirm that the attached document(s), on lin pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support si	le 2021, contains the required information
	addresses of community anchor institutions to which began providing	
	preceding calendar year.	,
	Safetine Manual State (Same Said Safetine Safeti	
<2021>	Interim Progress Community Anchor Institutions	1
		1 1
		Name of Attached Document(s) Usting Required Information

DATE AND DESCRIPTION OF THE PROPERTY OF THE PR	100022 SACO PYVER TRE, 6, TRE,	ding this data	Contact response Number of person identified in data line 4030> 2079929050 ext. Contact Email Address of person identified in data line 4030> megan, cobletonsunications.com	OFECX the boxes below te note compliance on its five year service quality plan (pursuent to 47 CR § 54.202(a)) and, for privately hald carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFECX the boxes below to accurate the financial reporting requirements set forth in 47 CFECX the boxes below to accurate.	100022me3010.pdf	Progress Repect on 5 Year Plan Milestone Certification (47 CFR § 54.313(P(1)(1)) Name of Attached Document Listing Required Information	Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to \$54.313 (IV(1)), the cerrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	100022me3012.pdf	Community Anchor Institutions (47 CFR § 54.313(f)13(ii))	Is your company a Privately held ROR Carrier (47 CFR § 54.313(f)(2)) Highs, does your company file the RUS annual report (Yes/No)	Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:	[Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Hame of Attached Document Listing Required information (Yea/No)	lease check the boxes below to	confirm poor suchnisson, on are such prinater to 9 xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	Management letter and audit ophnion issued by the independent certified public accountant that performed the company's financial audit If the response is no on line 3018, please check the boxes below to centim your submission, on line 3026 pursuant to § 54.313(f)(2),	inancial statement which has been subject to review by an	independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications	Bonnowers, Undertwise information subjected to a review by an independent certified	the first the second of the se	Underhying information subjected to an officer certification. Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	Attach the worksheet listing required information	Name of Attached Document Listing Resoured Information
(bod) see of found corter completely best collection from	<010> Study Area Code <015> Study Area Name		<035> Contact Telephon <039> Contact Email Add	CHECK the boxes below to		(3010) Progress Repert (Milestone Certific	Please check this (3011) § 54.313 (f)(1)(ii) providing access		(3012) Community Ancho	(3013) Is your company a (3014) If yes, does your o	Please check these boxe	(3015) Electronic copy of Telecommunicatio	(3016) Document(s) for	(3017) If the response is y report and all requ	(3018) If the response is r		(3019) ERher a copy of th	(3020) Document(s) for	(3021) Management lett If the response is to confirm your si	(3022) Copy of their finan		Borrowers,		(3025) Underlying inform (3025) Document(s) for	(3026) Attach the worksh	

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	200	102	20	12	1
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4020b Program Year 2016 4030b Contact Name - Person USAC should contact regarding this data Megasa. Coblesish 4035s Contact Telephone Mumber of person identified in data line 4030b 2019929050 ext. 4035b Contact Telephone Mumber of person identified in data line 4030b 2019929050 ext. 4035b Contact Final Address of person identified in data line 4030b account.	<015>	Study Area Name	SACO RIVER TEL & TEL
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PISON	<035>	Contact Telephone Number - Number of person identified in data line <030>	2079929050 ext.
	<039>	PISON	megan.cobleigh@offcommunications.com

Financial Data Summary (3027) Revenue	(3028) Operating Expenses	(3029) Net Income	(3030) Telephone Plant In Service(TPIS)	(3031) Total Assets	(3032) Total Debt	(3033) Total Equity	(3034) Dividends

	ion-Reporting Carrier ection Form	FCCFormats "GNSFControlinic 3566-0989/CNA Control No. 2060-0029 Taly 9983
<010>	Study Area Code	100022
<015>	Study Area Name	SACO RIVER TEL & TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Megan Cobleigh
<035>	Contact Telephone Number - Number of person identified in data line <030>	2079929050 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	megan.cobleigh@ottcommunications.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate. Name of Reporting Carrier: Signature of Authorized Officer: Date Printed name of Authorized Officer: Title or position of Authorized Officer: Title or position of Authorized Officer: Study Area Code of Reporting Carrier: Filling Due Date for this form: Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

PERSONAL PROPERTY.	on - Agent / Careler ection Form	BCC FORWARD ON STREET AND THE STREET
<010>	Study Area Code	100022
<015>	Study Area Name	SACO RIVER TEL & TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Megan Cobleigh
<035>	Contact Telephone Number - Number of person identified in data line <030>	2079929050 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	megan.cobleigh@ottcommunications.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier certify that (Name of Agent) JSI is authorized to submit the information reported on behalf of the reporting carrier. also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate. Name of Authorized Agent: JSI Name of Reporting Carrier: SACO RIVER TEL & TEL Signature of Authorized Officer: CERTIFIED ONLINE Date: 06/19/2015 Printed name of Authorized Officer: Dennis Andrews Title or position of Authorized Officer: Senior Vice President Telephone number of Authorized Officer: 2565861420 ext. Study Area Code of Reporting Carrier: 100022 Filing Due Date for this form: 07/01/2015 Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier , as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate. SACO RIVER TEL & TEL Name of Reporting Carrier: Name of Authorized Agent or Employee of Agent: JSI Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE Date: 06/19/2015 Printed name of Authorized Agent or Employee of Agent: Tanea Davis Foglia Title or position of Authorized Agent or Employee of Agent Manager - Regulatory Affairs Telephone number of Authorized Agent or Employee of Agent: 3014597590 ext. Study Area Code of Reporting Carrier: 100022 Filing Due Date for this form: 07/01/2015 Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

Attachments

ATTACHMENT - LINE 112

Five-Year Network Improvement Plan and Progress Report

ATTACHMENT REDACTED IN ENTIRETY

Saco River Telephone LLC Line 510

Service Quality Standards and Consumer Protection Rules

The company complies with applicable service quality standards and consumer protections, including, without limitation: (1) compiling monthly trouble report data and submitting the data on a quarterly basis to the Maine Public Utilities Commission; (2) reporting major service interruptions to the MPUC in a manner consistent with its orders and rules; (3) maintaining local service tariffs and rate schedules on file, giving notice of changes to such rate schedules pursuant to MPUC rules, and making rate and service information available for public inspection at the company's offices and on its website; (4) clearly listing all charges and credits on customers' bills; (5) providing full and prompt investigation of, and response to, customer complaints in accordance with dispute resolution procedures established by the MPUC; (6) providing access to enhanced 911; (7) participating in a statewide system to assist the hearing impaired and providing service discounts for the deaf, hard of hearing, blind and visually impaired; (8) complying with federal CPNI rules and other applicable consumer privacy protection requirements, including training of employees that have access to CPNI on the rules and procedures for protecting account information and authenticating callers; and (9) implementing procedures that are consistent with the FTC's guidance on measures to detect/prevent identity theft (Red Flag).

In addition, the company adheres to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service, and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the 2015 Open Internet Order when it becomes effective.

Saco River Telephone LLC Line 610

Functionality in Emergency Situations

The company certifies it is able to function in emergency situations. The company has a combination of permanently placed generators at its central office(s), business office(s), 24 x 7 Network Operations Center, and other mission critical locations, plus numerous portable generators for use at remote switching sites. In addition to onsite technicians, all systems are accessible via our remotely located 24 x 7 staffed Network Operations Center, with on-call technicians available 24 hours a day. Poles, cables, central office, remote, and miscellaneous plant equipment are kept at various sites and are available for emergency repairs. Technicians and Operations Management staff carry company-provided cells phones which are used on a daily basis and to maintain a communication link in the event of a major outage on our network or during emergency situations.

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<010>	Study Area Code	100022
<015>	Study Area Name	SACO RIVER TEL & TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Megan Cobleigh
<035>	Contact Telephone Number - Number of person identified in data line <030>	2079929050 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	megan.cobleigh@ottcommunications.com
<701>	Residential Local Service Charge Effective Date 1/1/2015 Single State wide Participating Local Service Charge	

<703>

<81>	esb .	<83>	 645	462>	4635	4045		(b)
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fee
MB	Waterboro		FR	14.35	0.0	0.221	0.0	14.57
MB	Waterboro		FR	15.58	0.0	0.235	0.0	15.82
ME	West Buxton		FR	14.35	0.0	0.223	0.0	14.57
MB	West Buxton		FR	15.58	0.0	0.235	0.0	15.82
MB	Bar Mills	NO. 1000 1550	FR	14.35	0.0	0.23	0.0	14.58
ME	Bar Mills		FR	15.58	0.0	0.235	0.0	15.82
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<010>	Study Area Code	100022
<015>	Study Area Name	SACO RIVER TEL & TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Megan Cobleigh
<035>	Contact Telephone Number - Number of person identified in data line <030>	2079929050 ext.
<039>	Contact Fmail Address - Fmail Address of person identified in data line <030>	magan cobletabantrommunications.com

State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service -	Broadband Service -Upload Speed (Mbps)	Usage Allowance	Usage Allowance Action Taken When Limit Reached (select)
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ME	ALL	38.45	0.0	38.45	9.0	1.0	999999	Other, No limit on usage allowand
мв	ALL	43.45	0.0	43.45	12.0	1.0	999999	Other, No limit on usage allowand
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Data Col	ection Form		ONES Control No. 3060-0819 (06/2013
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<010>	Study Area Code		100022
<015>	Study Area Name		SACO RIVER TEL & TEL
<020>	Program Year		2016
<030>	Contact Name - Person I	JSAC should contact regarding this data	Megan Cobleigh
<035>	Contact Telephone Num	ber - Number of person identified in data line <030>	2079929050 ext.
<039>	Contact Email Address -	Email Address of person identified in data line <030>	megan.cobleigh@ottcommunications.com
<810>	Reporting Carrier	Saco River Telephone LLC	
<811>	Holding Company	Otelco Inc.	
<812>	Operating Company	Saco River Telephone LLC	

Affiliates	SAC	Doing Business As Company or Brand Designation
CRC Communications LLC		OTT Communications
ALCOHOL MARKETINE CO.		
Marine III - 1998 AND 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997		- W - CAPARE
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Saco River Telephone LLC Line 1210

Terms and Conditions for Lifeline Customers

Saco River Telephone LLC's terms and conditions of voice telephony plans (local and toll) offered to lifeline customers can be found at the following websites:

http://www.ottops.com/wp-content/uploads/2015/02/polr-tariff-sft.pdf

http://www.ottops.com/wp-content/uploads/2015/02/terms-conditions-srt.pdf

Saco River Telephone LLC (SAC #100022)

Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))

Saco River Telephone LLC hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service at with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

Saco River Telephone LLC (SAC 100022)

Response to Line 3012 - List of Community Anchor Institutions to Which the ETC Newly Began Providing Service

The FCC's *USF/ICC Transformation Order* requires a listing of community anchor institutions to which the ETC newly began providing broadband service. Saco River Telephone Company hereby provides the FCC with a list of community anchor institutions to which it newly began providing access to broadband service in calendar year 2014.¹

Number	Name	Address		
1	Tropic Pets	998 Main St, Waterboro, ME 04087		
2 Central Maine Power		176 Sokokis Trl, Waterboro, ME 04087		
Phonics-First Reading and Preschool		356 Mary Jane Rd, Buxton, ME 04093		
4 Krayola Kids Day Care		27 Pine Country Dr, Buxton, ME 04093		
5	Hollis Animal Clinic	20 Little Falls Rd, Hollis, ME 04042		

The FCC has defined community anchor institutions in Section 54.5 of its Rules as "schools, libraries, health care providers, community colleges, other institutions of higher education, and other community support organizations and entities."